

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Conditional Major-Draft Permit No. F-03-001

Western KY University
One Big Red Way
Bowling Green, Kentucky 42101

June 18, 2003

Eric Brown, Reviewer
Plant I.D. #: 21-227-00012
Application Log #: 50110

SOURCE DESCRIPTION:

An operating permit application was received from Western KY University on December 11, 1996 and was considered complete on February 07, 1997. The applicant proposes to operate twenty-five (25) indirect heat exchangers. These heat exchangers consist of 2 coal-fired units (46.6 MMBtu/hr and 50.5 MMBtu/hr), and 23 natural gas fired units (12 with a combined rating of 36.3 MMBtu/hr, 2 72.8 MMBtu/hr units, 8 units with a combined rating of 24.9 MMBtu/hr, and 1 unit with a 20 MMBtu/hr rating). The applicant wishes to also operate a paint spray booth with a maximum operating rate of 0.25 gal/hr. The source has agreed to take federally enforceable limitations to preclude applicability of Regulation 401 KAR 52:020. The source will limit its annual tons of coal burned at Emission Points 01 and 02 to 6450 tons, and will set a source-wide cap of 750,000,000 cubic feet of natural gas burned in all its boilers.

COMMENTS:

Based on the information provided, the Division concluded that Regulation 401 KAR 61:015 applies to the existing boilers that were constructed before 1972 and 401 KAR 59:015 applies to the new boilers, which were built after 1972. Regulation 401 KAR 60:005, incorporating by reference 40 CFR 60, also applies to emission unit 07, and regulation 401 KAR 59:010 applies to the spray booth.

Emissions were calculated based on AP 42(7/98) tables 11-3.1 and 1-4. The results of the analysis are summarized in the air quality analysis and indicate that the standards will not be exceeded. Since this review has disclosed that all requirements will be met, a preliminary determination has been made that an operating permit may be issued as conditioned, contingent on to the satisfactory resolution of any adverse public comments, which might be received. Additional information used in making this review was obtained from existing agreed limitations records on file.

EMISSION AND OPERATING CAPS DESCRIPTION:

The source has also agreed to take federally enforceable limitations to preclude implementation of Regulation 401 KAR 52:020. The source will limit its annual tons of coal burned at Emission Point 01 and 02 to 6450 tons, and will set a source-wide cap of 750,000,000 cubic feet of natural gas burned in all its boilers. Additional operating limitations are set out in Section D of the permit.

OPERATIONAL FLEXIBILITY: None

CREDIBLE EVIDENCE:

This permit contains provisions that require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements.

At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.